

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re:

Sears Holdings Corporation, et al,

Chapter 11

Case No. 18-23538-rdd

Debtors.

Joint Administration

-----X

**NOTICE OF APPEARANCE AND
REQUEST FOR NOTICES AND PAPERS**

To: The Clerk of the Above-Named Court

PLEASE TAKE NOTICE that JS Sainty Hantang Trad Co. Ltd ("JS Sainty"), hereby appears by its counsel, Law Offices of Chen & Associates, P.C., and such counsel hereby enters its appearance and requests, pursuant to Bankruptcy Rules 2002, 3017, 9007 and 9010 and sections 342 and 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or filed in the above-captioned cases be given and served upon the following persons at the following addresses, including email addresses and telephone number:

Law Offices of Chen & Associates, P.C.
39-15 Main Street, Suite 502
Flushing, NY 11354
Email address: chenattorney@yahoo.com

PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, notice of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, hand or courier delivery, telephone, telecopy, telegraph, telex, electronically

or otherwise filed with regard to the referenced cases and proceedings therein. Further, this request includes copies of any disclosure statements to be submitted prior to approval and any and all plans of reorganization.

PLEASE TAKE FURTHER NOTICE that JS Sainty intend that neither this Notice of Appearance, nor any former or later pleading, claim or suit shall waive (1) JS Sainty's rights to have final orders in non-core matters entered only after de novo review by a District Court Judge, (2) JS Sainty's rights to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related in this case, (3) JS Sainty's rights to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (4) JS Sainty's rights to have any claims constitutionally required to be determined by the District Court be determined therein, (5) JS Sainty's rights to have any matter heard by an arbitrator, or (6) any other rights, claims, actions, defenses, setoffs, or recoupments to which JS Sainty is or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments JS Sainty expressly reserve.

Dated: December 14, 2020

Law Offices of Chen & Associates, P.C.

By: /s/Yimin Chen
Yimin Chen, Esq.
Bo Shi, Esq.
39-15 Main Street, Suite 502
Flushing, NY 11354
(718) 886-4858
Email address: chenattorney@yahoo.com

Attorneys for JS Sainty Hantang Trad Co. Ltd